

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
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	:	
LEHMAN BROTHERS HOLDINGS INC. and	:	
LEHMAN BROTHERS OTC DERIVATIVES INC.:	:	
	:	
	:	Adv. Proc. No. 13-01340 (SCC)
Plaintiffs,	:	
	:	
v.	:	
	:	
INTEL CORP.,	:	
	:	
Defendant.	X	
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**DECLARATION OF MAHESH VENKATAKRISHNAN**

I, MAHESH VENKATAKRISHNAN, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate in the law firm Jones Day, counsel to Plaintiffs Lehman Brothers Holdings Inc. and Lehman Brothers OTC Derivatives Inc. in this action. I am a member in good standing of the Bar of the State of New York.

2. I submit this Declaration to put before the Court certain documents that are referenced in Plaintiffs' Memorandum of Law in Support of Their Motion for Summary Judgment and the Statement of Undisputed Material Facts in Support of Plaintiffs' Motion for Summary Judgment, submitted herewith.

3. Attached to this declaration, under the identified exhibit numbers, are true and correct copies of the following documents:

Exhibit	Description
1.	1992 ISDA Master Agreement, Multicurrency—Cross Border, dated as of February 1, 2008 (“Master Agreement”).
2.	Schedule to the Master Agreement, also dated as of February 1, 2008.
3.	Confirmation dated as of August 1, 2008.
4.	1994 standard form ISDA Credit Support Annex.
5.	Letter from Intel Corporation to Lehman Brothers OTC Derivatives Inc., dated September 26, 2008.
6.	Letter from Intel Corporation to Lehman Brothers OTC Derivatives Inc., dated September 29, 2008.
7.	Letter from Intel Corporation to Lehman Brothers OTC Derivatives Inc., dated September 30, 2008.
8.	Defendant Intel Corporation’s Objections and Responses to Plaintiffs’ Second Set of Interrogatories to Defendant Intel Corporation, dated February 3, 2014 (excerpts).
9.	Defendant Intel Corporation’s Objections and Responses to Plaintiffs’ Third Set of Interrogatories to Defendant Intel Corporation, dated August 8, 2014 (excerpts).
10.	ISDA, User’s Guide to the 1992 ISDA Master Agreements (1993 ed.).
11.	Written Submissions on Behalf of the International Swaps and Derivatives Association, Inc. (“ISDA”), <i>Lomas v. JFB Firth Rixson Inc.</i> , Case. No. A2/2011/0070, (July 29, 2011) (English Court of Appeal (Civil Division)).
12.	Second Written Submissions on Behalf of the International Swaps and Derivatives Association, Inc. (“ISDA”), <i>Lomas v. JFB Firth Rixson Inc.</i> , Case. Nos. A2/2011/0070, A2/2011/1059, A3/2011/1107, & A3/2011/2106, (October 25, 2011) (English Court of Appeal (Civil Division)).
13.	<i>Anthracite Rated Investments (Jersey) Ltd. v. Lehman Bros. Fin. S.A.</i> , [2011] EWHC 1822 (CH).
14.	<i>Britannia Bulk plc (in liquidation) v. Bulk Trading S.A.</i> , [2011] EWHC 692 (Comm).
15.	2002 ISDA Equity Derivatives Definitions.

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 20, 2015  
New York, New York

/s/ Mahesh Venkatakrishnan  
Mahesh Venkatakrishnan

**CERTIFICATE OF SERVICE**

I, Mahesh Venkatakrishnan, hereby certify that on January 20, 2015, a true and correct copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF system.

Dated: January 20, 2015  
New York, New York

/s/ Mahesh Venkatakrishnan

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